

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

_____	)	
MICHAEL SEAN SPEIGHT,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:24-cv-00055-LM-AJ
	)	
AMANDA KAELEBLEIN,	)	
MICHAEL KAELEBLEIN,	)	
NANCY KAELEBLEIN,	)	
JUDGE GEORGE PHELAN, and	)	
ERIC STEPHAN,	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANTS MICHAEL KAELEBLEIN AND NANCY KAELEBLEIN'S  
OBJECTION TO PLAINTIFF'S MOTION  
REQUESTING COURT TO ALLOW PLAINTIFF  
TO AMEND COMPLAINT TO PROPER RELIEF IN INTEREST OF JUSTICE**

Defendants Michale Kaelblein and Nancy Kaelblein hereby object to Plaintiff's Motion Requesting Court to Allow Plaintiff to Amend Complaint to Proper Relief in Interest of Justice. In support of their Objection, Defendants file contemporaneously with this pleading their Memorandum of Law in Support of Their Objection to Plaintiff's Motion Requesting Court to Allow Plaintiff to Amend Complaint to Proper Relief in Interest of Justice.

**WHEREFORE**, Defendants Michael Kaelblein and Nancy Kaelblein respectfully request that this Court:

- A. DENY Plaintiff's Motion Requesting Court To Allow Plaintiff To Amend Complaint To Proper Relief In Interest Of Justice; and
- B. GRANT such other and further relief as may be just and equitable.

Respectfully submitted,  
Michael Kaelblein and Nancy Kaelblein  
By their Attorneys  
Welts, White & Fontaine, P.C.

Date: 07/08/24

By: /s/ Nicole Fontaine Dooley  
Nicole Fontaine Dooley, Esq.  
NH Bar No. 266186  
29 Factory St./P.O. Box 507  
Nashua, NH 03061-0507  
(603) 883-0797  
[nfontainedooley@lawyersnh.com](mailto:nfontainedooley@lawyersnh.com)

CERTIFICATE OF SERVICE

I, Nicole Fontaine Dooley, hereby certify that on July 8, 2024, this document was filed through the ECF system and sent electronically to the registered participants as identified on the notice of electronic filing (NEF) and by first class mail to non-registered participants.

/s/ Nicole Fontaine Dooley  
Nicole Fontaine Dooley